Samuel D. Brownback

Topeka, Kansas

September 20, 1999

Scott E. Thomas Chairman Federal Election Commission 999 E Street, NW Washington, DC 20463

Dear Chairman Thomas:

I am in receipt of your August 3, 1999 letter from the Commission to me concerning MUR 4736. Since this Factual and Legal Analysis contains the same unsupported, conclusory allegations that I addressed in my previous letter to the Commission, I refer the Commission to my prior submissions in response to MURs 4568, 4633 and 4634.

I am still unclear on what grounds you have found reason to believe against me. As I stated in my previous letter to you in response to MURs 4568, 4633 and 4634, I have no knowledge of Triad, Citizens for Reform and the Citizens for Reform Education Fund, other than what I learned subsequent to the 1996 elections. The Factual and Legal Analysis offers no evidence that either I or my campaign knew of the Triad activities you describe before they occurred.

Moreover, the Factual and Legal Analysis betrays a fundamental misunderstanding of how campaigns operate. Candidates and campaign staff meet as much as possible with potential supporters. Some of these individuals decide to assist the campaign if they support the candidate and his or her positions on the issues. The Factual and Legal Analysis does not present any support for the idea or theory that these types of activities warrant a reason to believe finding against me personally, or my campaign. Yet, the Factual and Legal Analysis colors these alleged activities as improper or illegal without any specific facts or legal authority to support the finding. In addition, with respect to the PAC contributions to my campaign, the statements in my previously submitted affidavit remain uncontroverted other than speculative, unsupported theories by the Commission.

Since the Commission has not presented any facts or law to controvert my prior submissions in this matter, I object to any finding against me and urge the Commission to dismiss this matter against me.

	Sincerely, M. Bunwanh
	Sam Brownback
Subscribed and sworn to before me this	day of September, 1999.
Notary Public	
My Commission expires:	